

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

OCT 24 4 45 PM '01

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS VAN-TY-SMITH TO INTERROGATORY OF MAGAZINE  
PUBLISHERS OF AMERICA, INC.  
(MPA/USPS-T-13-1)

The United States Postal Service hereby provides the response of witness Van-Ty-Smith to the following interrogatory of Magazine Publishers of America, Inc.:  
MPA/USPS-T-13-1, filed on October 10, 2001.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Frank R. Heselton

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-4823; Fax -5402  
October 24, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS  
VAN-TY-SMITH TO MPA INTERROGATORIES**

**MPA/USPS-T13-1.** In Section B.2.3 of your testimony, you describe how you developed distribution keys for mail processing cost pools.

- (a) Please identify and describe all differences between the method you are proposing in this case to develop cost pool distribution keys and the method you proposed in Docket No. R2000-1.
- (b) Since the closing of the record in Docket No. R2000-1, has the Postal Service or any of its contractors performed any analyses of the causal relationship between allied mail processing costs and subclasses of mail? If so, please provide a copy of each analysis.

**Response to MPA/USPS-T13-1.**

- (a) Once the tallies are assigned to cost pools based on the procedures described in Section B.2.2, there is no difference in the way the Postal Service uses the tallies to develop cost pool distribution keys in this rate case and the method it proposed in Docket No. R2000-1.
- (b) I am not aware of any such studies.

# DECLARATION

I, Eliane Van-Ty-Smith, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Eliane Van-Ty-Smith

Dated: October 24, 2001

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Frank R. Heselton

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
October 24, 2001